

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Tonawanda Coke Corporation - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: POLREP #4
Tonawanda Coke Corporation
0201601
Tonawanda, NY

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From: Thomas P. Budroe, OSC

Date: 10/21/2018

Reporting Period: 10/21/2018

1. Introduction

1.1 Background

Site Number:	A28U	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	STATE	Incident Category:	
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	10/13/2018	Start Date:	10/13/2018
Demob Date:		Completion Date:	
CERCLIS ID:	NYD088413877	RCRIS ID:	
ERNS No.:		State Notification:	Yes
FPN#:		Reimbursable Account #:	

1 Incident Category

Abandoned coke manufacturing plant releasing hazardous substances to the environment.

1.1.2 Site Description

Tonawanda Coke Corporation is a coke manufacturing plant; approximately 160 acres in an industrial area. The facility has been in operation for approximately 100 years. The 30 currently operating coke ovens have been in use since early 1960.

1.1.2.1 Location

The facility is located at 3875 River Rd, Tonawanda, Erie County, New York. The area is an industrial area adjacent to the Niagara River. The nearest residence is located approximately 0.25 miles away.

1.1.2.2 Description of Threat

Flammable liquids contained in bulk storage tanks pose a threat of fire and explosion should they encounter an ignition source. Sodium hydroxide, a corrosive material, has been discharged onto the ground and poses a health threat to anyone who may come in contact with this material. One scrubber tower contains a pyrophoric material which may spontaneously combust if the nitrogen blanket inside the vessel is not maintained. Drums of hydrochloric acid and solvents are being stored on an unpaved surface without secondary containment. A full removal site evaluation will be conducted and addressed following facility shutdown.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA is inspecting the Site, with limited assistance from TCC, to identify all areas of concern and determine which facility operations will require EPA's immediate attention to circumvent a release of hazardous substances to the environment.

2. Current Activities

2.1 Operations Section

2.1.2 Response Actions to Date

EPA was advised that the plant experienced another in-house power failure last night (Saturday, 10/20/18).

Once again, an in plant short resulted in a power outage, however the portable diesel compressor and a tertiary boiler house compressor were brought online in time to avoid the shutdown of the boiler. An electrician who came into the plant last night was unable to identify and remedy the electrical problem and a portion of the plant remains without power. The backup compressors are marginally able to supply enough compressed air to keep the boiler running. Although there is enough diesel fuel to keep the compressor running, a visual inspection of the diesel compressor suggests it may break down at any time. EPA placed a call to the Plant Manager to discuss this concern but has not been able to reach him.

EPA was informed by the Environmental Manager that due to the bankruptcy, TCC does not have the funds to purchase the sodium hydroxide which is necessary to run the ammonia still and treat the stored waste water.

The OSC still occasionally receives conflicting information from different TCC personnel regarding how the plant operates.

The OSC continues to inspect and evaluate all vessels, systems and releases on the plant. The OSC met with the plant manager to generate a list of personnel essential to the continued safe operation of the plant. This list was provided to ORC and DOJ who is anticipated to present it to TCC on Monday, October 22, 2018. The list will be provided to TCC in anticipation that they will keep the listed personnel on their payroll.

EPA continues working on hiring site security and company employees, taking over utilities, contracting with Praxair for a nitrogen blanket supply and preparing to operate the water treatment systems.

Solid and liquid contamination is present in a containment area that is not secure due to cracks in the berm, gaps in the berm wall and open thru pipes running through the berm. The precipitation and recent power failures has caused the level of the material in the containment area to rise significantly. The solid contamination laying in the containment area is a constant source of contamination to the precipitation. EPA is preparing to sample and begin the cleanup of this area.

A second location in the storage/process area is unpaved black ground with tar-like contamination on the surface. An extremely strong petroleum chemical odor was observed emanating from this area. This area is at a lower elevation than the surrounding area and abuts a small brick structure which further provides containment to any spills in this area. EPA is also preparing to sample and begin the cleanup of this area.

2.1.3 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

TCC filed for bankruptcy on October 16, 2018. ORC continues to represent EPA's interest with TCC attorneys.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

EPA is preparing to assume responsibility for securing the Site. Upon being notified that TCC is no longer maintaining the treatment of storm water and process water discharges, EPA reached out internally to obtain information regarding the two treatment system design and operation. EPA is considering operating these systems with input of experts from EPA's Division of Enforcement and Compliance Assistance (DECA). In order to evaluate the current effectiveness of these systems, EPA will be sampling the discharge from both during the week of October 22, 2018. DESA will conduct sample collection and samples will be analyzed by the EPA Region 2 lab. There has been conflicting information from TCC regarding the layoff of plant personnel responsible for the operation of the boiler which is necessary to maintain steam lines which will provide for additional purging of the system and operation of the byproduct treatment system. It is however EPA's understanding that TCC will continue to operate the boiler in the near term. EPA will continue efforts to assume responsibility for all utilities in order to maintain power to the facility. EPA will also continue to work with the TCC Environmental Manager to gain information regarding plant operations and potential/actual releases of hazardous substances. EPA is preparing to sample and cleanup contamination in two separate plant areas.

2.2.1.2 Next Steps

EPA will continue to assess the potential public and environmental threats posed by the Site.

2.2.2 Issues

TCC will not inform EPA how long they will remain on site to assist with transition.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$150,000.00	\$0.00	\$150,000.00	100.00%
Intramural Costs				
Total Site Costs	\$150,000.00	\$0.00	\$150,000.00	100.00%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.2 Cooperating Agencies

EPA is coordinating with NYSDEC and the Town of Tonawanda Water Resources Department.

4. Personnel On Site

One OSC and one ERRS member are on site.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

7. Situational Reference Materials

No information available at this time.